

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOUGLAS JOHNSON,

Plaintiff,

-vs-

COOK COUNTY SHERIFF THOMAS DART,)
in his official capacity, ANTWAUN)
BACON, a CCDOC officer, and COOK)
COUNTY, a municipal corporation,)

Defendants.)

No. 22-cv-03718

Zoom deposition of OFFICER KAREN PURCELL taken
before REGINA E. GEBERT, CSR and Notary Public, pursuant
to the Federal Rules of Civil Procedure for the United
States District Courts pertaining to the taking of
depositions. The deposition commenced at 1:00 o'clock
p.m. on the 28th day of March, A.D. 2024.

1 There were present at the taking of this
2 deposition the following counsel:

3 DVORAK LAW OFFICES by
4 MR. ADRIAN BLEIFUSS PRADOS,
5 One Walker Avenue, Suite 204
6 Clarendon Hills, Illinois 6051402
7 (630) 590-9158
8 ableifuss@gmail.com,

9 on behalf of the Plaintiff;
10 ASSISTANT STATE'S ATTORNEY
11 CIVIL RIGHTS/TORTS LITIGATION
12 CIVIL ACTIONS BUREAU;
13 COOK COUNTY STATE'S ATTORNEY'S OFFICE by
14 MR. JAMES O'CONNOR,
15 500 Richard J. Daley Center
16 Chicago, Illinois 60602
17 (312) 603-4327
18 rebecca.laue@cookcountysao.org,

19 on behalf of the Defendants,
20 Cook County Sheriff Thomas Dart
21 and Cook County;
22 DEVORE RADUNSKY by
23 MR. ZACHARY STILLMAN,
24 230 West Monroe Street, Suite 230
 Chicago, Illinois 60606
 (312) 300-4479
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 on behalf of the Defendant,
 Officer Antwaun Bacon.

- - - - -

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DEPOSITION OF
Officer Karen Purcell

March 28, 2024

| EXAMINATION BY: | PAGE |
|----------------------------|------|
| Mr. Adrian Bleifuss Prados | 4 |

* * * * *

EXHIBITS

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| Purcell Group Exhibit 2 (Inmate Grievance Form) | PAGE 11 |
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* * * * *

1 OFFICER KAREN PURCELL,
2 called as a witness herein, having been first duly
3 sworn, was examined upon oral interrogatories and
4 testified as follows:

5 EXAMINATION

6 by Mr. Bleifuss Prados:

7 Q Good afternoon, ma'am. Thank you so much for
8 your time this afternoon. Could you please state your
9 full name and spell it for the record?

10 A Karen, K A R E N, Purcell, P as in Paul U R C E
11 L L.

12 Q Okay. And are you currently retired from
13 working for the Cook County Sheriff?

14 A Yes.

15 Q And when did you retire?

16 A November of 2023.

17 Q Congratulations. And did you have a star number
18 or employee number associated with your work -- or with
19 your job at the sheriff's?

20 A Yes.

21 Q And what was that number?

22 A 758.

23 Q Okay. And have you ever been deposed before?

24 A No.

1 Q Okay. Just a few ground rules. It's very
2 natural in human conversation to anticipate the question
3 that someone's about to ask you and so you'll be tempted
4 to jump in before the question ends and fully posed and
5 I just ask that you try not to do that because that
6 makes it hard for the court reporter. Does that make
7 sense?

8 A Yes.

9 Q And if I phrase a question in a way that's
10 confusing or doesn't make sense to you, please let me
11 know that the question is confusing or that you'd like
12 me to rephrase the question otherwise I'll assume that
13 you understood the question. Does that make sense?

14 A Yes.

15 Q Okay. When were you -- where did you attend
16 high school?

17 A Chicago Vocational High School in Chicago.

18 Q And when did you graduate?

19 A 1986.

20 Q And do you have any college education after high
21 school?

22 A Yes.

23 Q And where did you go to college?

24 A I went several places. I went to Malcolm X

1 College, I went to Kennedy King College, I went to
2 Triton College and I went to Truman College.

3 Q And did you complete a degree at any or all of
4 those institutions?

5 A Yes.

6 Q And what was that degree and when did you
7 receive it?

8 A My last degree was in Christian Science. It was
9 received in 2013.

10 Q Okay. And do you have any experience working
11 for any law enforcement agency other than the Cook
12 County Sheriff?

13 A Yes.

14 Q And what was that employer?

15 A I worked as a security guard at Malcolm X
16 College City Colleges.

17 Q Okay. And how many years did you work in that
18 position?

19 A I believe it was 12 years.

20 Q Okay. And did you -- have you worked in any
21 other law enforcement capacities?

22 A No.

23 Q Have you ever served in the armed forces?

24 A No.

1 Q And when were you first hired by the Cook County
2 Sheriff?

3 A I was originally hired in April of '93 as a
4 paramedic, I left the paramedic and became a sworn
5 officer in 1998 in February, February of 1998.

6 Q And when you became a sworn officer, what part
7 of the sheriff's operation were you working out of at
8 that time?

9 A The Department of Corrections.

10 Q Okay. And did you remain with the Department of
11 Corrections until your retirement in 2023?

12 A Yes.

13 Q Okay. And am I right that you retired with the
14 rank of sergeant?

15 A No.

16 Q All right. What was your rank when you retired,
17 ma'am?

18 A Lieutenant.

19 Q Lieutenant. Okay. And when did you achieve
20 that rank?

21 A 2021.

22 Q Okay. And do you recall what your duties were
23 in July of 2020?

24 A I had the duties of a sergeant.

1 Q Okay. And what are the duties of a sergeant in
2 the Cook County Sheriff's Department of Corrections?

3 A They vary.

4 Q Okay. Have you -- apart from talking to counsel
5 have you done anything to prepare for this deposition?

6 A No.

7 Q Have you reviewed any documents in preparation
8 for this deposition?

9 A No.

10 Q Have you read the Complaint in this
11 deposition -- in this lawsuit?

12 A No.

13 Q Do you know Defendant Antwaun Bacon?

14 A I don't recall that person, so no.

15 Q Do you recall Douglas Johnson, the plaintiff in
16 this lawsuit?

17 A No.

18 Q Do you know anything about the allegations that
19 are made in this lawsuit?

20 A No.

21 Q I'd like to show you what I will call Purcell --
22 we'll mark it Purcell Exhibit 1 and then you can explain
23 to me what it is exactly. Just a second. Let me figure
24 out the sharing.

1 Okay. Can you see this document I'm showing?
2 It's of an Excel sheet.

3 A Yes.

4 Q And it's titled Tier Log Inquiry, correct?

5 A Yes, sir.

6 Q And it shows Area Supervisor K. Purcell under --
7 that would be in the middle column. Do you see that?

8 A Yes, I do.

9 Q And there's a Supervisor star 1234. Do you know
10 what that's about?

11 A When -- in roll call they see the supervisors
12 that are assigned that day and they have to put a
13 supervisor's name in there in order to close the tier
14 log for the day so when I was at the roll call, then
15 they put my name.

16 Q Okay. And the 1234, do you know what that
17 means?

18 A They have to put your star down but most of the
19 time they don't know your star.

20 Q Okay. So they just guess 1234.

21 A Yes, in order to close the tier log, yes, sir.

22 Q And is it your understanding this reflects the
23 fact that you were working in Division 8 on July 19,
24 2020?

1 A Yes. That's what it says, yes, sir.

2 Q Okay. Do you recall working with Officer Orr in
3 Division 8?

4 A Yes.

5 Q Okay. And what were your duties in July of 2020
6 working in Division 8?

7 A I was a sergeant.

8 Q Okay. And what was required of you as a
9 sergeant? What sort of work would you be doing?

10 A I would make rounds and make sure everything was
11 going. If there was a problem, whoever is available, if
12 a supervisor is available, I would respond to that
13 problem, to that tier, to escalate the situation.

14 Q Okay. And from this Tier Log Inquiry is it
15 apparent that you logged in at 6:00 a.m. that morning
16 and did a 12-hour shift?

17 A Yes, sir.

18 Q Okay. So given that you don't remember Douglas
19 Johnson, and given that you don't know anything about
20 this lawsuit, is it fair to say that you don't recall
21 anything about the day -- do you recall anything about
22 the events of July 19, 2020?

23 A No.

24 Q Do you recall an inmate complaining about a

1 wrist injury on that day?

2 A No.

3 Q Okay.

4 A I don't recall that specific incident, no, sir.

5 Q Okay. And as far as you know, this day was like
6 any other day and you have no specific recollection of
7 it, correct?

8 A That is correct, sir.

9 Q Okay. Were you at all responsible for
10 transporting inmates between different divisions? Is
11 that a duty that you would have overseen?

12 A No. No.

13 Q Okay.

14 A We have a transport officer.

15 Q Okay. And detainees are called -- are they
16 called IICs? Is that the right terminology?

17 A As of today, yes.

18 Q Okay. And what does that mean?

19 A Incarcerated Individuals in Custody, IIC.

20 Q Okay. I'm going to stop sharing.

21 I'm going to show you, I guess, what I'll call
22 Purcell Group Exhibit 2. I'm starting here on Bates
23 number 4119. This is a -- what does this document
24 appear to be to you?

1 A The Inmate Grievance Form.

2 Q Okay. And are you familiar with this sort of
3 document?

4 A Yes.

5 Q Okay. And this document was filled out by a
6 person obviously other than yourself. Do you mind
7 taking a second to read the narrative? I know that it's
8 handwritten but if you could just take a moment to read
9 the narrative there if you can see it. If you'd like, I
10 can try to make it larger.

11 A Please.

12 Q All right. Is that better?

13 A Yes, it is.

14 Q Okay. Yes, sir.

15 A (Unintelligible).

16 MR. O'CONNOR: My apologies. The court reporter is
17 still taking down everything that you're saying so --
18 you can just read it to yourself as opposed to -- and
19 then let us know when you're finished.

20 THE WITNESS: Okay. I'm done.

21 MR. BLEIFUSS PRADOS: Q Okay. And is there any
22 chance that grievance refreshes any recollection about
23 what happened on -- and the events that may have
24 happened on July 19, 2020?

1 A No, sir.

2 Q Okay. I'm scrolling down to the bottom of that.
3 Do you recognize the signature at the bottom there?

4 A It looks like Swangen (phonetic) --

5 Q Okay.

6 A -- which was one of the social workers. It
7 looks like Swangen if I remember her signature
8 correctly.

9 Q Okay. Do you remember her first name?

10 A No.

11 Q Okay. And I'm going to scroll down to the
12 second page of Purcell Group Exhibit 2. I'm going to
13 zoom out a bit. What does this -- is this the second
14 page of the same document or is this a different
15 document?

16 A It appears to be the second page.

17 Q Okay. And what's the function of this second
18 page if you know?

19 A The second page, after follow-up that's the page
20 that the supervisor would fill out, whoever is doing the
21 grievance would fill out.

22 Q Okay. And do you recognize the signature on
23 this second form?

24 A It looks kind of like Superintendent Boutte,

1 B-O-U-T-T-E.

2 Q You haven't seen your signature anywhere on
3 this -- on this document, correct?

4 A No, sir.

5 Q Okay. I'm going to scroll down to the third
6 page. And this includes a request for an appeal, is
7 that correct?

8 A I can't really see it.

9 Q Okay. I'm going to enlarge it. Can you see it
10 better now?

11 A Yes.

12 Q Okay. And can you take a moment to silently
13 read the inmate's request for an appeal?

14 A Okay.

15 Q Okay. And again, this request for an appeal
16 doesn't refresh your recollection about this incident,
17 is that correct?

18 A That is correct.

19 Q Okay. And here there's also a signature. Do
20 you recognize that signature?

21 A No, I do not.

22 Q Okay. I'll stop sharing that.

23 In your work at the Cook County Jail did you
24 ever oversee the movement of inmates with canes between

1 different divisions or different parts of the jail?

2 A When you say oversee the movement, do you mean
3 take them from place to place?

4 Q For example, take them from place to place.

5 A I would take them from -- when staff is short, I
6 would assist. It's very rarely that I may take them to
7 a visit or something like that.

8 Q Okay. But it's not something you do frequently?

9 A No, sir.

10 Q Okay. And in terms of restraints such as
11 handcuffs placed on persons who have to use canes, do
12 you have any recollection about what your practice was
13 with respect to that?

14 A Yes.

15 Q And what was that? What's your recollection?

16 A If they tell us that they can't be handcuffed or
17 they're not supposed to be handcuffed, we would have to
18 go into the computer or refer with Medical because
19 Medical is the only one that can say whether or not
20 they're handcuffed or not, give them the -- tell us that
21 it's okay not to handcuff them.

22 Q Okay.

23 A Because --

24 Q Go ahead. I'm sorry.

1 A Cook County practice is everyone gets
2 handcuffed; everyone.

3 Q Okay. And is it -- is it fair to say that this
4 is not something that you were involved with very
5 frequently?

6 A That is correct, sir.

7 Q Okay. Is there a possibility of offering a
8 wheelchair to somebody who has to use a cane?

9 A Anything is possible.

10 Q Okay. And would you agree that a chief
11 consideration in securing IICs as they move around the
12 jail is making sure that they're not injured?

13 A I can agree to that.

14 Q Do you have any recollection of the Department
15 of Corrections' Policy 708 or 709 regarding restraints
16 on -- the use of restraints on inmates?

17 A I've honestly tried to forget everything since
18 I've retired.

19 Q Okay.

20 A Can you refresh my memory?

21 Q Sure. Do you think that you've -- since you
22 retired have you made an effort to kind of put the
23 details of your work at the DOC behind you?

24 A No, sir, I wouldn't say that.

1 Q Okay. What would you say?

2 A I would say that I'm at a new chapter in my life
3 so --

4 Q Okay. I'm going to show you what I guess we'll
5 call Purcell Exhibit 3.

6 A Yes, sir.

7 Q Do you have any recollection of seeing this
8 Policy 708, Control of Inmate Movement?

9 A Yes, I've seen it.

10 Q Okay. And where have you seen it?

11 A It's one of the policies that we have -- that
12 they have there.

13 Q Okay. And would these policies have been
14 communicated to sheriff's personnel through email?

15 A Yes.

16 Q Okay. And when you would have received the
17 three emails, is that how you would have seen it?

18 A Probably, yes, sir.

19 Q Okay. And am I right that when you would
20 receive one of these policies from the sheriff there
21 would be a check box on the email confirming that you've
22 read it?

23 A Yes.

24 Q Okay. As far as you know, is there any way that

1 the sheriff could verify that any particular personnel
2 had actually read the email?

3 A I'm sure he has a way but I don't know. He
4 would have to answer that.

5 Q So you don't know, is that fair to say?

6 A Yes, it is.

7 Q And I guess I'll show you now what we'll call
8 Purcell Exhibit 4. This is Policy 709 from the DOC.
9 Have you seen this policy before?

10 A Yes, sir.

11 Q Do you have a specific recollection of seeing
12 this policy or do you just figure that you probably saw
13 it at some point?

14 A I'm sure I've seen it at some point.

15 Q Okay. But you don't have a specific
16 recollection of seeing this policy.

17 A No. We have had a lot of policies ---

18 Q Okay.

19 A -- that --

20 Q I'm sorry. Go ahead.

21 A -- that we were issued.

22 Q Okay. And the same is true of Policy 708 that I
23 just showed you, correct? You have no specific
24 recollection of seeing that policy?

1 A Correct.

2 Q Okay. And would Policy 709 also have been
3 relayed to you through email the way that 708 probably
4 was?

5 A Yes, sir.

6 Q Okay. Would you agree that an important
7 consideration in fastening handcuffs on an inmate is
8 making sure that there's enough room so that the inmate
9 is not injured?

10 A Yes.

11 Q And how is that determined, do you know? If you
12 know.

13 A Can you rephrase the question? I don't
14 understand.

15 Q I'll try. I phrased it poorly.

16 How is that assured when handcuffs are being
17 fastened upon an inmate?

18 A Are you asking me how do we assure that they're
19 not too tight or something?

20 Q Yes, exactly right.

21 A When you fasten them, there's a finger -- if you
22 could put your finger through, you put your finger
23 through, you test it to make sure it's not too tight on
24 them but also that they can't get out of them.

1 Q Okay. And so there should be enough room always
2 in the handcuff for one finger to be able to be inserted
3 through the gap?

| | | |
|---|---|------|
| 4 | A | Yes. |
|---|---|------|

5 Q Okay. And is the concern that if they're too
6 tight they might cause an injury to the wrist. Is that
7 part of the consideration there?

8 A I would assume so.

9 Q Okay. In your entire -- if I could just take a
10 five-minute break, I don't think I have any more
11 questions but if we could just go off the record for
12 five minutes?

| | |
|----|---------|
| 13 | A Okay. |
|----|---------|

14 MR. O'CONNOR: That's fine.

15 (break)

16 MR. BLEIFUSS PRADOS: Thank you for indulging me
17 with that break. I actually have no more questions.

18 MR. O'CONNOR: I don't have any questions based on
19 that.

20 MR. STILLMAN: I also have no questions.

21 MR. BLEIFUSS PRADOS: Thank you so much, ma'am, for
22 your time this afternoon. I'm sorry that we had
23 technical difficulties at the beginning. It always
24 happens.

1 THE WITNESS: Okay.

2 MR. O'CONNOR: So do you wish to review the
3 transcript prior to it being finalized or do you -- are
4 you comfortable waiving signature?

5 THE WITNESS: I'm comfortable waiving signature.

6 (WHEREUPON the deposition was concluded at 1:40 p.m.)

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1 STATE OF ILLINOIS)
) SS:

2 COUNTY OF COOK)

3 The within and foregoing deposition of the
4 aforementioned witness was taken before REGINA E.
5 GEBERT, CSR and Notary Public, at the place, date and
6 time aforementioned.

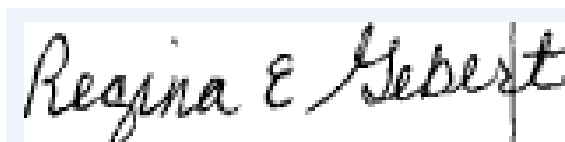
7 There were present during the taking of the
8 deposition the previously named counsel.

9 The said witness was first duly sworn and was
10 then examined upon oral interrogatories; the questions
11 and answers were taken down in shorthand by the
12 undersigned, acting as stenographer and Notary Public;
13 and the within and foregoing is a true, accurate and
14 complete record of all of the questions asked of and
15 answers made by the aforementioned witness, at the time
16 and place hereinabove referred to.

17 Before completion of the deposition, review of
18 the transcript { } was, {X} was not requested. If
19 requested, any changes made by the deponent (and
20 provided to the reporter) during the period allowed are
21 appended hereto.

22 The undersigned is not interested in the
23 within case, nor of kin or counsel to any of the
24 parties.

1 Witness my official signature and seal as
2 Notary Public in and for Cook County, Illinois, on this
3 4th day of December, A.D. 2024.
4

5 

6 REGINA E. GEBERT, CSR
7 Notary Public
8 License No. 084-002972
9 One North Franklin Street,
10 Suite 2100
11 Chicago, Illinois 60606
12 (312) 442-9087
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[03718 - avenue]

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[guard - mind]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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